

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED  
JAN 11 2007  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

VALERIE DEHAECK \*

Kapelstraat 2C, 2520 Broechem \*

Belguim, Europe \*

JAN 11 2007

CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

and \*

KIM CLEMENTINA MICHEL DEHAECK \*

Vernard de Vadderlaan 28, 2950 Kapellen \*

Belgium, Europe \*

and \*

SOPHIE DEHAECK \*

Niellonstraat 22, 2600 Berchem \*

Belgium, Europe \*

and \*

DAVID DEHAECK \*

Desguinlei 90 app. 8F \*

Belgium, Europe \*

Civil Action No.

PN 07 CV 0090

Plaintiffs \*

v. \*

GINA LOUIE, M.D. \*

c/o Shrewsbury Diagnostic Imaging \*

1131 Broad Street (HWY 35), Suite 110 \*

Shrewsbury, New Jersey 07702 \*

and \*

ASSOCIATED RADIOLOGISTS, P.A. \*

251 Antietam Street \*

Hagerstown, Maryland 21740 \*

Serve on: Barry D. Berman, Esquire \*

100 Light Street, Suite 1100 \*

Baltimore, MD 21202 \*

Defendants

\* \* \* \* \*

**COMPLAINT AND DEMAND FOR JURY TRIAL**

The Plaintiffs, Valerie Dehaeck and Kim Clementina Michel Dehaeck, by Dennis F. O'Brien, P.A., and Foard, Gisriel, O'Brien & Ward, L.L.C., their attorneys, and Sophie and David Dehaeck, by Wendy L. Shiff and Salsbury, Clements, Bekman, Marder & Adkins, L.L.C., their attorneys, file this Complaint and Election for Jury Trial against the Defendants and say:

1. This case was originally filed in the Health Care Alternative Dispute Resolution Office. Plaintiffs elected to waive arbitration. Copy of Election to Waive Arbitration is attached as Exhibit A.

2. Diversity jurisdiction exists as the amount in controversy exceeds \$75,000.00 and the parties are citizens of different states.

3. The Plaintiffs, Valerie Dehaeck, Kim Clementina Michel Dehaeck, Sophie Dehaeck and David Dehaeck, are the natural children of the Deceased, Alfons Matilda Dehaeck, who at all times pertinent was a resident of Washington County, Maryland, up until his death in October 2003.

4. On or about October 6, 2003, the Deceased, Alfons Matilda Dehaeck, presented to Washington County Hospital with a chief complaint of persistent pain in the back of the head and at the base of the neck. There was no history of trauma.

5. A CT scan of the head without contrast was ordered, taken and read by the Defendant, Gina Louie, M.D., who read the scan as "negative."

6. At all times pertinent, the Defendant, Gina Louie, M.D., was an agent, servant and employee of the Defendant, Associated Radiologists, P.A.

7. As a result of the scan being read as negative, the Deceased was sent home.

8. Actually, the CT scan was not “negative” and demonstrated a bleed in the left basal cistern and in the occipital basins of the lateral ventricles. These findings were suggestive of a “sentinel” bleed and were missed by the radiologist, Defendant, Gina Louie, M.D.

9. Had these films been interpreted properly, the Deceased could have been treated and would have had an excellent chance of recovery with no deficits.

10. The Defendant, Gina Louie, M.D., acting as the agent, servant or employee of Associated Radiologists, P.A., deviated from the accepted standard of care in that she failed to properly assess and interpret the CT film, failed to obtain further consults or studies, failed to consider pertinent clinical information, all leading to this sentinel bleed being undetected, resulting in a massive subarachnoid bleed on October 12, 2003, which resulted in death on October 15, 2003.

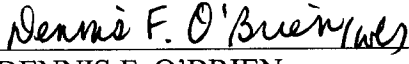
11. The Defendant, Gina Louie, M.D., acting as the agent, servant or employee of Associated Radiologists, P.A., owed the Deceased a duty to adhere to the accepted standard of care for practitioners in her class, and breached that standard, causing the Deceased’s condition to go untreated, resulting in his death.

12. Each of the Plaintiffs (children), Valerie Dehaeck, Kim Clementina Michel Dehaeck, Sophie Dehaeck and David Dehaeck, lost and will lose the comfort, care, society, affection and support the Deceased would have provided during their joint life expectancies.

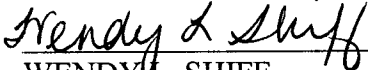
13. So that all of the injuries, losses and damages were as a result of the departures from the accepted standard of care by the Defendant, Gina Louie, M.D., acting as the agent, servant or employee of Associated Radiologists, P.A., all without any negligence on the part of

the Deceased contributing.

WHEREFORE, each of the Defendants (children), Valerie Dehaeck, Kim Clementina Michel Dehaeck, Sophie Dehaeck and David Dehaeck, claim all damages allowed by law for the wrongful death of Alfons Matilda Dehaeck.

  
DENNIS F. O'BRIEN  
FOARD, GISRIEL, O'BRIEN  
& WARD, L.L.C.  
29 West Susquehanna Avenue  
Suite 302  
Towson, Maryland 21204  
(410) 296-1440

Attorneys for Plaintiffs, Valerie Dehaeck  
and Kim Clementina Michel Dehaeck

  
WENDY L. SHIFF  
SALSBURY, CLEMENTS, BEKMAN,  
MARDER & ADKINS, L.L.C.  
300 West Pratt Street  
Suite 450  
Baltimore, Maryland 21201  
(410) 539-6633

Attorneys for Plaintiffs, Sophie Dehaeck  
and David Dehaeck